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MOTION PICTURE ASSOCIATION
OF AMERICA, INC.
1600 EYE STREET, NORTHWEST
WASHINGTON, D.C. 20006

Federal Communications Commission
Office of Secretary

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August 12, 1996

BY HAND DELIVERY

Mr. William F. Canton
Acting Secretary
Federal Communications Commission
1919 M. Street, N.W.
Washington, D.C. 20554

DOCKET FILE COPY ORIGINAL

RE. MM Docket No. 87-268

Advanced Television Systems

Dear Mr. Caton:

Transmitted herewith on behalf of the Motion Picture
Association of America, Inc. are an original plus nine copies of its
Reply Comments in the above referenced proceeding.

Respectfully submitted,

A handwritten signature in cursive script, appearing to read "Bonnie J. K. Richardson".

Bonnie J. K. Richardson

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**BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, DC 20554**

**Federal Communications Commission
Office of Secretary**

In the Matter of)	
)	
Advanced Television Systems)	
and Their Impact Upon the)	MM Docket No. 87-268
Existing Television Broadcast)	
Service)	

**REPLY COMMENTS OF
MOTION PICTURE ASSOCIATION OF AMERICA, INC.**

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**REPLY COMMENTS OF
MOTION PICTURE ASSOCIATION OF AMERICA, INC.**

1. The Motion Picture Association of America, Inc. ("MPAA"),¹ submits these Reply Comments with respect to certain aspects of the comments made by other parties in the above-referenced proceeding.

2. In its comments, MPAA supported the technical aspects of the Advanced Television Systems Committee's ("ATSC") Digital Television Standard ("ATSC Standard") particularly: (1) the use of a 16:9 aspect ratio and (2) the inclusion of both progressive and interlaced

¹ MPAA is a trade Association representing eight of the largest U.S. producers, distributors, and exporters of theatrical motion pictures, television programming, and home video entertainment. They include: Buena Vista Pictures Distribution, Inc. (Disney); Sony Pictures Entertainment Inc.; Metro-Goldwyn-Mayer Inc.; Paramount Pictures Corporation; Turner Broadcasting System Inc.; Twentieth Century Fox Film Corporation; Universal City Studios Inc.; and Warner Bros. A Division of Time Warner Entertainment Company, L.P. MPAA is also represented on the ATSC.

transmission formats. The 16:9 screen aspect ratio contained in ATSC Standard will provide maximum accommodation for the transmission of program material originally produced in different aspect ratios and will facilitate international program exchange. An interlaced transmission format will allow for the broadcast transmission of live action in high definition until such time as technology permits transmission of this much picture information progressively.

3. The ATSC standard provides for viewing pictures in virtually any aspect ratio on a 16:9 receiver by using letterboxing or side panels in those cases where the picture does not exactly fit the screen. MPAA believes the 16:9 aspect ratio has been proven through public process to be an appropriate standard and disagrees with Robert Primes, The Computer Industry Coalition and The Coalition of Film Makers that the standard forces broadcasters to pan and scan. The ATSC Standard does not require that transmitted programs conform to a 1.78:1 (16:9) or a 1.33:1 (4:3) aspect ratio. With a 16:9 receiver, wide-screen feature films (i.e., 1.85:1 and greater) can be viewed in their original formats by using letterboxing. (About 80% of films are 1.85:1, these films would lose only about 4% of their screen height when shown at full width. The other 20% of films are 2.4:1, these films would lose about 25% of their screen height).

4. Contrary to the comments of Microsoft, The Coalition of Film Makers and The Computer Industry Coalition, the MPAA believes that the availability of progressive and interlaced scanning transmission parameters facilitate interoperability of digital television with other media. While a majority of video, all motion pictures, and all other material originating in film, including most prime time television programs and commercials, will be transmitted using the progressive scanning formats, the inclusion of interlaced formats is essential to

broadcasters to enable them to transmit both live action events and archived interlaced video programs efficiently and to promote easy interoperability with cable television and satellite services and with international digital video standards, all of which currently utilize interlaced scanning. Moreover, interlaced transmissions can be displayed progressively with minimal additional cost to home television receivers.

5. There is no evidence that the mandatory 480 line baseline format proposed by The Computer Industry Coalition and The Coalition of Film Makers would permit high-definition television (HDTV) from the outset. The proposed ATSC digital television standard will enable theater-quality high resolution films to be displayed on high-definition television sets immediately. For the first time, television viewers will be able to experience movies in their homes on widescreen receivers with picture clarity and surround sound that approaches that available in movie theaters. The ATSC digital television technical standards can provide capability, giving more than twice the vertical resolution (using the 1080 line, progressive scan, 24 frame per second format) than the 480 line baseline format would provide. MPAA believes that broadcasters should have the option of choosing HDTV and therefore opposes a mandatory 480 line baseline format.